Ontario only

Canderel's Integrated Accessibility Standards Policy

Date: May 2021

Version 3.0



1. Principle

The goal of the Accessibility for Ontarians with Disabilities Act, 2005 (the 'Act') is to create a more accessible Ontario, by identifying and, to the extent possible, preventing and eliminating barriers experienced by a person with a disability. The Integrated Accessibility Standards Regulation ('IASR') has been established under the Act to establish accessibility standards in the areas of information and communication, employment, transportation, design of public space and customer service.

Canderel strives to treat all individuals in a manner that allows them to maintain their dignity and independence. Canderel promotes integration and equal opportunity and is committed to meeting the needs of people with disabilities in a timely manner. We will seek to achieve this by preventing and removing barriers to accessibility and by meeting accessibility requirements under the Act.

The objective of this policy (the 'Policy') is to identify and document how Canderel seeks to achieve compliance with the requirements of the IASR and how it will continue to work toward improving accessibility for persons with disabilities.

This Policy will be publicly available, including in an accessible format upon request.

2. Application

The Policy applies to:

- (a) Every person who is an employee of, or a volunteer with, Canderel.
- (b) Every person who participates in developing Canderel' policies.
- (c) Every other person who provides goods, services or facilities on behalf of Canderel.

3. Definitions

Accessible Formats – Include but are not limited to large print, recorded audio and electronic formats, braille, and other formats usable by persons with disabilities.

Communication Supports – Include but are not limited to captioning, alternative and augmentative communication supports, plain language, sign language and other supports that facilitate effective communications.

Performance Management – Activities related to assessing and improving employee performance, productivity, and effectiveness with the goal of facilitating employee success.

Redeployment – The reassignment of employees to other departments or jobs within the organization as an alternative to layoff when a particular job or department has been eliminated by the organization.

Unconvertible Information or Communications – means information or communication that it is not technically feasible to convert, or if it is technically feasible to convert, the technology required to do so is not readily available.

Web Content Accessibility Guidelines (WCAG) 2.0 – means the international standard for making a website and web content accessible to people with a wide-range of disabilities. The IAS requires an organization to become compliant with two levels of the WCAG 2.0 - Level A and Level AA

4. General Accessibility Standards

Accessibility Plan

Canderel has established and implemented an Accessibility Plan to outline the Company's strategy to prevent and remove barriers for a person with a disability and meet the requirements of the IASR. Canderel will maintain the Accessibility Plan in accordance with the requirements of the IASR and will review and update it at least once every five (5) years. The Accessibility Plan is posted on Canderel's website and will be made available in an Accessible Format, upon request.

Training Requirements

Canderel will provide training on the requirements of the accessibility standards referred to in the IASR and on the *Ontario Human Rights Code*, as it pertains to persons with disabilities.

In accordance with the IASR, Canderel will:

- determine and ensure that appropriate training on the requirements of the IASR and on the *Human Rights Code* as it pertains to persons with disabilities, is provided to all employees and volunteers, all persons participating in the development of Canderel policies, and all other persons providing goods and services on behalf of Canderel in Ontario, and;
- ensure training is appropriate to the duties of the persons referenced above;
- ensure that the training is provided to persons referenced above as soon as practicable;
- keep and maintain a record of the training provided, including the dates that the training
 was provided and the number of individuals to whom it was provided; and
 ensure that training is provided on any changes to Canderel's policies on an ongoing
 basis.

5. Information and Communication Standards

Feedback Process

Canderel will ensure its process for receiving and responding to feedback is accessible to persons with disabilities by providing or arranging for the provision of Accessible Formats and

Communications Supports, upon request. Canderel will notify the public of the availability of Accessible Formats and Communication Supports for feedback purposes.

Accessible Formats and Communication Supports

With the exception of Unconvertible Information or Communications, Canderel will, upon request, provide or arrange for the provision of accessible formats and communication supports for persons with disabilities in a timely manner and at no additional cost to the individual.

Canderel will take into account the person's accessibility needs when customizing individual requests and shall consult with the individual making the request to ensure suitability.

Canderel will make the availability of accessible formats and communication supports publicly known.

Emergency Plans, Procedures and Public Safety Information

Canderel will provide any emergency plans, procedures, or public safety information that it makes available to the public in an Accessible Format or with appropriate Communication Supports upon request and as soon as practicable.

Accessible Websites and Web Content

In accordance with the IASR, Canderel will take reasonable steps to ensure that all new websites controlled by Canderel, and web content on those sites published after January 1, 2012, will conform with the World Wide Consortium Web Content Accessibility Guidelines (WCAG 2.0) Level A, except where meeting the requirement is not practicable.

In accordance with the IASR, Canderel will take reasonable steps to ensure that all internet websites controlled by Canderel, and web content on those sites published after January 1, 2012 will be compliant with the WCAG 2.0, Level AA, by January 1, 2021, except where meeting the requirement is not practicable and except for exclusions set out in the IASR.

6. Employment Standards

The Employment Standards only apply to Canderel employees. They do not apply to volunteers or other unpaid individuals or contractors.

Recruitment, Assessment and Selection

Canderel will notify employees and the public about the availability of accommodation for job applicants who have disabilities during the recruitment process. Applicants selected to participate in the assessment or selection process will be informed that accommodations are available, upon request. When an accommodation is requested, Canderel will consult with the applicant and provide or arrange for the provision of a suitable accommodation in a manner that takes into account the applicant's accessibility needs.

When making offers of employment, we will notify the successful applicant of our policies for accommodating employees with disabilities.

Informing Employees of Support

Canderel will inform its employees as soon as practicable after they begin their employment, of our policies used to support our employees with disabilities, including, but not limited to, policies on the provision of job accommodations that take into account an employee's accessibility needs due to disability. Canderel will provide updated information to its employees whenever there is a change to existing policies on the provision of job accommodations.

Accessible Formats and Communication Supports for Employees

If an employee with a disability requests it, Canderel will provide or arrange for the provision of accessible formats and communication supports for the following:

- Information needed to perform his/her job; and
- Information that is generally available to all employees in the workplace.

Canderel will consult with the employee making the request to determine the suitability of an accessible format or communication support.

Workplace Emergency Response Information

Where required, Canderel will create individual workplace emergency response information for employees with disabilities. This information will take into account the unique challenges created by the individual's disability and the physical nature of the workplace and will be created in consultation with the employee.

This information will be reviewed when:

- The employee moves to a different physical location in the Company;
- The employee's overall accommodation needs, or plans are reviewed; and/or
- Canderel reviews general emergency response procedures.

Documented Individual Accommodation Plans/Return to Work Process

Canderel will develop and have in place a written process for the development of documented individual accommodation plans for employees with disabilities.

Canderel will develop and have in place a documented return to work process for its employees who have been absent from work due to a disability and require disability-required accommodations in order to return to work.

Performance Management and Career Development and Advancement

Canderel will consider the accessibility needs and individuals accommodation plans of employees with disabilities when implementing performance management processes, or when offering career development or advancement opportunities.

Redeployment

The accessibility needs, as well as individual accommodation plans, of employees with disabilities will be taken into account in the event of redeployment.

7. Design of Public Spaces Standard

While Canderel has no plans to engage in new construction or redevelopment which would be captured by the requirements of the IASR concerning the Design of Public Spaces, Canderel recognizes its obligations under the relevant sections of the IASR and is committed to incorporating barrier-free design principles into any public spaces that are newly constructed and redeveloped on or after January 1, 2017.

Canderel will put procedures in place to prevent service disruption to its accessible parts of public spaces. In the event of a service disruption, Canderel will notify the public of the service disruption and alternatives available.

8. Customer Service Standard

In accordance with its customer service standard requirements under the IASR, Canderel is committed to providing exceptional customer service to all of its customers and clients. For more information, please refer to Canderel's Accessible Customer Service Policy.

For more information on this Policy and its content, please contact: HRservices@canderel.com

Current version

May 2021

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Version history

Version #	Date	Updated/Changed by	Changes made
1.0	2015	Created by Barbara Mirehouse	
2.0	Oct. 2019	Sarah Fortin	Extracted from Handbook
3.0	May. 2021	Sarah Fortin	Updated clauses and wording across the Policy

Classification

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Company restricted	This document should only be accessed by users within the relevant entity and should only be distributed internally	
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